

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**IN RE:**

**Hughes, Gerald D and Genus,  
Beckie Beverly  
DEBTOR(S)**

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**CASE NO. 24-35085**

**CHAPTER 13**

**DEBTOR(S)' MOTION FOR EXTENSION OF AUTOMATIC STAY  
PURSUANT TO 11 U.S.C. § 362(c)(3)**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Debtor(s) in the above-referenced case, and Debtor(s)' Counsel files this *Motion for Extension of the Automatic Stay pursuant to 11 U.S.C. § 362(c)(3)* (the "Motion"), and respectfully state as follows:

1. This Motion requests an order from the Bankruptcy Court authorizing the extension of the automatic stay as to all scheduled creditors pursuant to 11 U.S.C. § 362(c)(3)(B). Within thirty (30) days of the Petition Date, the automatic stay in the above-referenced case will expire on November 30, 2024.
2. On October 30, 2024 (the "Petition Date"), Debtor(s) filed a voluntary petition under chapter 13 of title 11 of the U.S. Code in the above-referenced current case. The current case was filed within a 1-year period of the prior case being dismissed.
3. Debtor(s) filed a prior chapter 13 case number 24-32566 on June 03, 2024, which was dismissed on September 10, 2024. The prior case was dismissed due to incorrectly filed taxes. No motions for relief from stay were filed in the prior case.
4. The Debtor has no other bankruptcy cases filed in the preceding one-year period prior to the filing of the above-referenced case.
5. A substantial change in the financial or personal affairs of debtor(s) has occurred since the dismissal of the Debtor(s)' most recent case, so the Debtor(s) believe(s) that this case will be concluded with a discharge given the change in circumstances. Debtor and his wife originally filed separate IRS tax returns for the tax year 2023 and 2022 and anticipated owing taxes in excess of \$112,000. They since have filed an amended joint tax return and do not anticipate owing taxes to the IRS.
6. In order to ensure that the plan payments timely will be submitted to the chapter 13 trustee, we have requested a wage deduction order directed to the employers. Debtor(s) believes that they will be able to perform their duties and comply with the chapter 13 plan in the new bankruptcy case.

WHEREFORE, PREMISES CONSIDERED, Debtor requests that the Court grant the relief requested herein and grant such other and further relief to which the Debtor justly is entitled.

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Respectfully submitted,

RESOLVE LAW GROUP,  
A registered d/b/a of The Price Law Group, A.P.C.

/s/ Alan D Borden

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ATTORNEY FOR DEBTOR(S)

**CERTIFICATE OF SERVICE**

Counsel for the Debtor hereby certifies that, on or before November 6, 2024, a true and correct copy of the foregoing Motion was electronically noticed and/or mailed via first class mail, postage prepaid to the Debtor, the Chapter 13 Trustee, the U.S. Trustee, and all attorneys and parties-in-interest who have requested notices, and to each party on the attached service list (which also includes the parties listed on the certificate of service attached to Debtor's Plan).